

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE WESTERN DISTRICT OF NEW YORK

THE UNITED STATES OF AMERICA,

-VS-

GREGORY TROTTER,

Defendant.

24-cr-60-LJV

DEFENSE WITNESS LIST

The defendant hereby submits a list of persons whom the defense may call as witnesses in its case-in-chief, together with a brief summary of each witnesses' anticipated testimony and expected length of testimony. The defense reserves its right to call witnesses not listed and will advise promptly of its intent to do so.

1. **Scott Chamberlin**, Chief of Police, Amherst Police Department
Amherst, NY

Chief Chamberlin will testify about his contacts with and supervision of Detective Trotter at the Amherst Police Department, as well as the rules and procedures that Amherst Police officers and detectives are expected to follow when investigating criminal matters, interacting with the public, or otherwise conducting the business of the Amherst Police Department. Chief Chamberlin will also testify about Detective Trotter's reputation for truth, veracity, honesty, integrity, and for conducting himself as a law-abiding citizen.

The defense anticipates that Chief Chamberlin's direct examination will take approximately 1-1.5 hours.

2. **James McNamara**, Chief of Police, Depew Police Department, former Chief of Detectives, Amherst Police Department (RET)
Amherst, NY

Chief McNamara will testify about his contacts with and supervision of Detective Trotter at the Amherst Police Department, as well as the rules and procedures that Amherst Police officers and detectives are expected to follow when investigating criminal matters, interacting with the public, or otherwise conducting the business of the Amherst Police Department. Chief McNamara will also testify about Detective Trotter's reputation for truth, veracity, honesty, integrity, and for conducting himself as a law-abiding citizen.

The defense anticipates that Chief McNamara's direct examination will take approximately 1 hour.

3. **Cheryl Julicher**, Detective Lieutenant, Amherst Police Department
Amherst, NY

DL Julicher will testify about her contacts with and supervision of Detective Trotter at the Amherst Police Department, as well as the rules and procedures that Amherst Police officers and detectives are expected to follow when investigating criminal matters, interacting with the public, or otherwise conducting the business of the Amherst Police Department. DL Julicher will also testify about Detective Trotter's reputation for truth, veracity, honesty, integrity, and for conducting himself as a law-abiding citizen.

The defense anticipates that DL Julicher's direct examination will take approximately 45 minutes-1 hour.

4. **Beth Stephens**, Police Officer, Amherst Police Department (RET)
Amherst, NY

Ms. Stephens will testify about her relationship with Detective Trotter while they were both assigned to the Special Victims Unit of the Amherst Police Department and in particular, about their contacts with Peter Gerace in the course of domestic disputes involving Gerace and his ex-wife. Ms. Stephens will also testify about the rules and procedures that Amherst Police officers and detectives are expected to follow when investigating criminal matters, interacting with the public, or otherwise conducting the business of the Amherst Police Department. Finally, she will testify about Detective Trotter's reputation for truth, veracity, honesty, integrity, and for conducting himself as a law-abiding citizen.

The defense anticipates that Ms. Stephens' direct examination will take approximately 45 minutes-1 hour.

5. **Paul Alexander**, Detective, Amherst Police Department
Amherst, NY

Detective Alexander will testify about his relationship with Detective Trotter while they both worked as detectives in the Amherst Police Department. Detective Alexander will also testify about the rules and procedures that Amherst Police officers and detectives are expected to follow when investigating criminal matters, interacting with the public, or otherwise conducting the business of the Amherst Police Department. Finally, he will testify about Detective Trotter's reputation for truth, veracity, honesty, integrity, and for conducting himself as a law-abiding citizen.

The defense anticipates that Detective Alexander's direct examination will take approximately 30-45 minutes.

6. **JoAnn DiNoto**, Detective Lieutenant, Amherst Police Department (RET)
Clarence Center, NY

Ms. DiNoto will testify about her contacts with Detective Trotter at the Amherst Police Department and her roll within the Department, as well as the rules and procedures that Amherst Police officers and detectives are expected to follow when investigating criminal matters, interacting with the public, or otherwise conducting the business of the Amherst Police Department. Ms. DiNoto will testify about Detective Trotter's reputation for truth, veracity, honesty, integrity, and for conducting himself as a law-abiding citizen.

The defense anticipates that Ms. DiNoto's direct examination will take approximately 1 hour.

7. **Katherine Friehe**, Detective, Amherst Police Department
Amherst, NY

Detective Friehe will testify about her relationship with Detective Trotter while they both worked as detectives in the Amherst Police Department. Detective Friehe will also testify about the rules and procedures that Amherst Police officers and detectives are expected to follow when investigating criminal matters, interacting with the public, or otherwise conducting the business of the Amherst Police Department. Finally, she will testify about Detective Trotter's reputation for truth, veracity, honesty, integrity, and for conducting himself as a law-abiding citizen.

The defense anticipates that Detective Frieh's direct examination will take approximately 30-45 minutes.

Dated: June 16, 2025

Respectfully submitted,

s/Donald M. Thompson
Counsel for Gregory Trotter
16 West Main Street, Suite 243
Rochester, New York 14614
(585) 423-8290
www.etksdefense.com